

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CITY OF ALMATY, KAZAKHSTAN and BTA  
BANK JSC,

Crossclaim Plaintiffs,

- against -

MUKHTAR ABLYAZOV, VIKTOR  
KHRAPUNOV, ILYAS KHRAPUNOV, and  
TRIADOU SPV S.A.,

Crossclaim Defendants.

ECF Case

No. 1:15-cv-05345 (JGK) (KHP)

**DECLARATION OF DEBORAH A. SKAKEL IN SUPPORT OF  
DEFENDANT TRIADOU'S MOTION IN LIMINE NO. 6 TO EXCLUDE  
REFERENCES TO MURDER-FOR-HIRE ALLEGATIONS AND CONVICTION**

I, DEBORAH A. SKAKEL, declares as follows:

1. I am a partner at Blank Rome LLP, counsel for Triadou SPV S.A. ("Triadou"), and submit this Declaration in support of Triadou's Motion in Limine No. 6 to exclude references to murder-for-hire allegations and conviction.

2. Attached hereto as Exhibit 1 is a true and correct copy of an article titled *Tatishev's family publishes statement praising justice in Tokmadi case*, published by The Astana Times on April 10, 2018, and *available at* <https://astanatimes.com/2018/04/tatishevs-family-publishes-statement-praising-justice-in-tokmadi-case/>.

3. Attached hereto as Exhibit 2 is a true and correct copy of an article titled, *Kazakhstan: Tokmadi sentenced to 10 and a half years in prison for murdering former BTA Bank chair*, published by The EU Reporter on March 26, 2018, and *available at* <https://neweurasia.info/en/political-process/1636-kazakhstan-tokmadi-sentenced-to-10-and-a-half-years-in-prison-for-murdering-former-bta-bank-chair>.

4. Attached hereto as Exhibit 3 is a true and correct copy of an article titled, *Fugitive Kazakh Banker, Nazarbayev Foe Sentenced To Life In Prison*, published by Radio Free Europe/Radio Liberty on November 27, 2018, and *available at* <https://www.rferl.org/a/fugitive-kazakh-banker-nazarbaev-foe-sentenced-to-life-in-prison/29623588.html>.

5. Attached hereto as Exhibit 4 is a true and correct copy of an article titled, *Kazakhstan: Government's bete noire sentenced to life in jail*, published by EurasiaNet on November 28, 2018, and *available at* <https://eurasanet.org/kazakhstan-governments-exiled-bete-noire-sentenced-to-life-in-jail>.

6. Attached hereto as Exhibit 5 is a true and correct copy of transcript excerpts from the first day of the deposition of Mukhtar Ablyazov in this matter, conducted on October 30, 2018.

7. Attached hereto as Exhibit 6 is a true and correct copy of an article titled, *Jailed Kazakh Businessman Calls On President To Revise His Case, Retracts Testimony Against Ablyazov*, published by Radio Free Europe/Radio Liberty on March 9, 2022, and *available at* <https://www.rferl.org/a/kazakhstan-toqmadi-ablyazov-case-review/31745073.html>.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Kazakhstan 2020 Human Rights Report published by the United States Department of State, *available at* <https://www.state.gov/wp-content/uploads/2021/10/KAZAKHSTAN-2020-HUMAN-RIGHTS-REPORT.pdf>.

9. Attached hereto as Exhibit 8 is a true and correct copy of the Kazakhstan 2019 Human Rights Report published by the United States Department of State, *available at* <https://www.state.gov/wp-content/uploads/2020/02/KAZAKHSTAN-2019-HUMAN-RIGHTS-REPORT.pdf>.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York  
July 8, 2022

/s/ *Deborah A. Skakel*

Deborah A. Skakel